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UNCLAS SECTION 01 OF 08 KATHMANDU 000910

SIPDIS

DEPT FOR CA/FPP  
DEPT FOR INL/HSTC  
POSTS FOR FRAUD PREVENTION MANAGERS, DHS, LEGATT & DEA  
DHS FOR CIS/FDNS

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TAGS: [KFRD](#) [CVIS](#) [CPAS](#) [CMGT](#) [ASEC](#) [NP](#)

SUBJECT: FRAUD SUMMARY - KATHMANDU, NEPAL

REF: KATHMANDU 157

#### 1A. Country Conditions

1. Nepal is one of the poorest countries in the world, with a per capita income of less than USD400. A precarious peace following ten years of armed civil conflict, the Maoist party intimating a potential return to violence, weak government institutions under the current government - the second government since elections in April 2008 - and a faltering economy, including high unemployment and rising inflation, are all factors encouraging Nepalese to look for greater opportunities outside the country. Political and social instability are exacerbated by occasional incidents of both criminally and politically-motivated violence, especially in the Terai (the southern strip of Nepal bordering India).

2. The economy does not produce enough jobs to keep pace with students graduating from universities. Nepal produces approximately 400,000 new workers every year. Many of these look abroad for work. It is hard to get accurate figures, but the IMF estimates that remittances comprise more than 10 percent of GDP. During the recent global economic downturn, demand for Nepalese workers in Arabian Gulf countries and southeast Asia contracted rather than expanded, as had been the trend before the recession.

3. Nepal is a country with high levels of fraud. Corruption is a way of life in government institutions and beyond. Counterfeit educational, government-issued, bank, and employment documents are readily available for purchase. Genuine but fraudulently-obtained documents are also available, including passports and national ID cards, although these are significantly more expensive than counterfeit documents. In recent years, the level of fraud has risen most significantly in B, F, H, and L NIV visa categories, employment-based immigrant visas and the Diversity Visa program.

#### 1B. NIV Fraud

4. During FY 2009, post referred 210 NIV cases to the Fraud Prevention Unit (FPU). Applicants submit counterfeit educational certificates, bank statements, business registration documents, and invitation letters allegedly from business or personal contacts in the U.S. in support of their applications. Visa consultants often

provide counterfeit documents and misguided interview preparation services. These agencies make deceptive offers through newspaper, television and radio advertisements, convincing visa applicants that their chances of obtaining a visa will be enhanced by the consultants' assistance and advice. Approximately four years ago, the rise in the level of fraudulent documents presented by applicants led post to institute the practice whereby FPU screens all submitted documents prior to visa interviews. In the past month, Post has contracted a local production company to produce a set of public announcements for television and radio to dissuade Nepalis from resorting to fraud in their visa applications.

15. There are occasional reports of counterfeit U.S. NIV visas being produced inside Nepal and of Nepalis attempting to buy fake visas outside of Nepal.. In July 2008, post was alerted to a small office that was offering U.S. visas without having to go through the Embassy. A prospective recipient of a 'visa' presented a copy of one of these fake visas to the Embassy, inquiring about its authenticity. The individual provided the location of the office to the Embassy and local police arrested two suspects who were involved in the operation. A third suspect eluded police. Similarly in June 2009, an individual presented a copy of a supposed 'visa' to the Embassy. He admitted that he had sent his passport via courier to an address in Nigeria and was awaiting the return of his passport. He told us that the person in Nigeria who had promised the visa was awaiting his payment of thousands of U.S. dollars before his passport would be returned to him. In this case post was not able to apprehend the culprits but shared the information with post's RSO.

#### Student Visas

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16. Despite a decrease in student visa applications in FY2009 (13,018 applicants in FY2008 versus 8,780 in FY2009), a large number of Nepalis still apply to study in the U.S. As a result, instances of fraud remain frequent in these cases. A high percentage of student applicants appear for their interviews unprepared. They have difficulty providing credible explanation for why they chose the university and subject of study, and what is their general plan after receiving an American education. Consular officers have become familiar with common phrases visa facilitators coach their applicants to use, thereby making it easier to distinguish applicants trained by consultants from those who have done their own research, and therefore who are more likely genuine students.

Student visa applicants also recognize that their ability to pay the high cost of universities in the United States is an additional hurdle to their successfully getting a student visa. Applicants regularly bring to their interviews audit reports showing overvalued land, business holdings and property leases. Often, bank balances are either artificially built up within weeks of the visa interview, or someone within the bank, itself, falsifies months of credits and large deposits to indicate a credible source of income.

Post has become experienced in detecting counterfeit documents, thanks to the efforts of our FPU staff. Consular staff members work closely with RSO colleagues and the Criminal Investigation Division of the Nepal Police; when information is available, consular staff assist the police in tracing and prosecuting vendors of such documents. Unfortunately, few cases have resulted in convictions due to the lack of police resources to investigate and build solid cases. Post reaches out to, and receives invaluable assistance from, colleagues at posts in India when necessary to verify Indian academic certificates.

17. In early summer 2008, FPU staff learned that some educational consultancies were offering client students counterfeit documents to bolster their portfolios. Around that same time, FPU began noticing that some of the government-issued business registration certificates student applicants presented also looked suspicious. Post reached out to the Nepal government office that issues such certificates, to verify the suspicious documents' authenticity. More than three-quarters of the suspicious documents verified with the business registration office were counterfeit. This was an

indication that many student applicants' financial strength was not as sound as was being falsely presented.

#### Religious Visas

¶8. During FY 2009, fraud in religious visas continued to decline, particularly after R visas became subject to the visa petition process. Post had been seeing evidence of fraud, primarily among applicants posing as either Buddhist monks or genuine monks who presented fraudulent invitation letters, and secondarily among applicants claiming to be Hindu priests. A database, including sample genuine documents from many sponsoring organizations in the U.S., developed by post to combat R visa-related fraud has continued to show its effectiveness in helping to identify mala fide applicants, even in the face of a declining applicant pool. The result of cooperation between monastery leaders and FPU staff has been a growth in the discovery of counterfeit letters presented by applicants claiming connections to well-known monasteries. On the U.S. side, CA/FPP assisted post in checking the bona fides of sponsoring organizations. Many cases resulted in determinations that organizations were fictitious or the letterhead of genuine organizations was being used fraudulently.

#### Temporary Worker Visas

¶9. The demand for H1B visas in Kathmandu has grown, as the number of Nepali students studying in the U.S. has increased. Post anticipates continuing growth in H1B cases in coming years as the larger student numbers of the last few years complete their studies and employment in the U.S. There has been a corresponding growth in fraud in H1B cases as the number of applicants has risen.

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¶10. During FY 2009, H1B cases that were most often fraudulent were those in which the applicant completed his or her education in Nepal. Most H1B case reviews by FPU involved verifying educational documents or experience letters. In addition to counterfeit educational certificates, common FPU discoveries included inflated employment qualifications, in which the applicant did not have genuine qualifying experience, and outright false claims of work experience. In one recent example, the applicant claimed to be the chief accountant in the Nepali company but was actually a staff member in the marketing division.

¶11. During the past fiscal year, the number of applicants for H2B visas reached a plateau and then declined as Nepal was not included on the list of countries from which H2B workers could be recruited. Common problems in H2B cases have been fraudulent experience letters and educational documents submitted during interviews. Even though these documents may not have been material to the adjudication of the visa, their presence raised concern about the true intent of the applicant. Validation studies carried out by FPU confirmed that a high percentage of H2B workers issued visas the previous year had not returned from the U.S. upon completion of their contract.

¶12. Post's greatest concern about the H2B visa class in Nepal had been the vulnerability of applicants to unscrupulous middlemen who charged large amounts of money just for the opportunity to apply. These recruiters coached the applicants and gave them fraudulent documents for their visa interviews. In a case of 250 H2B workers who went to work in a compact disc packing plant, within four months of starting their work, more than 75 percent of them had left their jobs at the plant and have not been heard from since. One of the workers with whom post was able to contact reported that the company declined to pay the wage specified in his contract. The same worker confided that nearly all the workers he knew had paid money under the table in order to be included in the group applying for the visa. He claimed that applicants from the group had admitted paying between \$10,000 and \$24,000 to the recruiters. These revelations raised serious suspicions about the recruitment of H2B applicants and forced post to examine these applicants very closely.

¶13. In September 2008, the Consular Section Chief received the

first of a series of phone text messages offering \$10,000 per applicant for helping to facilitate visas for up to ten H2B workers.

The Section Chief immediately notified the RSO, who continued the communication in order to learn more about the sender's intent and plans. After several text message exchanges, the RSO set up a meeting with the sender to confront him. After talking with the individual, the RSO provided the information collected to the local authorities. Post has entered a lookout on the individual in INK in order to maintain a record of the incident and preserve the information so that it can be considered should the individual apply for a visa in the future.

#### L Visas

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¶14. Post's number of L visa applicants continues to be low, but the number doubled from 42 in FY 2008 to 88 in FY 2009. One Nepali company has established itself as reputable and has been granted a blanket L petition by USCIS. Much of the fraud seen in L cases stems from the inability of Nepali citizens to apply for E (treaty trader) visas. Applicants that in other countries might be typical applicants for E visas attempt to apply for L visas but may not satisfy all criteria for an L visa. Misrepresentation of the nature of the company and its business to DHS in the petition process is the most common type of fraud seen in L visa cases.

#### ¶C. IV Fraud

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¶15. Post processed 796 applicants and 620 cases immigrant visa cases during FY 2009. The FPU investigated a total of 1 159 IV cases during this time. Post's IV fraud primarily consists of fictitious marriages and/or divorces and false family relationships. 'Love marriages' are increasing in Nepal. However, Nepali society is still one in which parents and other family members arrange a

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majority of the marriages. In these marriages, the prospective husband and wife do not meet until only weeks, or even days, prior to the wedding ceremony. Often, one partner's U.S. citizenship or LPR status is viewed as a desirable attribute as a potential arranged spouse, just as a higher education or better job prospects would. Post does not necessarily take this as fraudulent intent to use the citizen's/LPR's status to immigrate, but uses it as a factor in judging the legitimacy of the relationship.

¶16. For the above-mentioned reasons, adjudication of IR and CR cases is sometimes problematic, as it is sometimes difficult to determine whether the marriage relationship is genuine. In some cases, American citizens, usually of Nepali origin, fly directly to Nepal from the United States, come to the Embassy within a day or two of arrival to obtain an affidavit of eligibility to marry (required by the GON to officially register a marriage), and marry someone whom they have only just met. Often they have communicated by phone prior to their arrival in Nepal, but they have not physically met each other. At the time of processing the affidavit of eligibility to marry, ACS staff members try to obtain as much information from the American citizen as possible about the spouse-to-be, in an attempt to identify immigration smuggling rings.

¶17. Other commonly-observed fraud attempts are carried out by families trying to pass off children of siblings as their own. Of late, post has increasingly used DNA testing to verify relationships in which there is suspicion and in which the applicant has not presented sufficient evidence to reasonably establish the relationship. Post has had cases in which the family has agreed to go through DNA testing, but the results revealed that the child is not the biological child of the applicant.

¶18. Post sees a high level of fraud in employment-based petitions, primarily in the E3 category. Misrepresentation of employment history, and thereby knowledge of the required skills, is common in employment-based visa cases. The availability of counterfeit documents and genuine documents obtained fraudulently creates the opportunity for applicants to change personal and family details, including date of birth, date of marriage, and the number of

children. In one follow-to-join case, the principal beneficiary came back to Nepal and into the Embassy to assist with his family's application. A consular officer took the opportunity to speak with him and discovered that he had no prior work experience but rather had submitted a fake work experience letter in the U.S. to get his ETA-750 processed. FPU has discovered that nearly 50 percent of work experience documents submitted with ETA-750 forms were fraudulent.

#### D. Diversity Visa Fraud

19. The Diversity Visa (DV) program in Nepal has maintained a high level of popularity. Among countries in which the DV program is available, Nepal has the 17th highest number of diversity visas. In FY 2009, post issued 1,544 visas under the DV program. The FPU investigated a total of 155 DV cases during this time. Weak economic and societal incentives to complete a 12th grade education and the lack of trained and skilled workers contribute to a moderate DV refusal rate, based on an inability to reach either the educational or work experience qualifications. Some DV winners who cannot qualify based on their education bring counterfeit educational certificates. FPU works with universities and educational boards to verify the integrity of educational documents, whereby post is confident that nearly all counterfeit educational certificates presented by applicants are uncovered. Indian educational certificates are also verified with the assistance of the American Embassy and Consulates in India. Post is grateful for close cooperation with the FPU's in India for this assistance.

20. Visa consultants and document vendors continue to try to take advantage of DV applicants. They provide fake documents and sometimes unscrupulous advice about how to fill out forms for a fee. During the annual EDV application season, streets are full of banners, signs and fliers from consultants offering services to hopeful DV applicants. Each year, some DV winners who might otherwise have qualified are disqualified because they failed to

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include family members in the initial entry. Post has had moderate success at getting out the message that it is critical to follow the program guidelines carefully and that it is difficult in Nepal to qualify based on work experience alone. On the opening day of last year's EDV application season, two consular officers were guests on a call-in radio program about the DV program. In order to maximize the effect of this opportunity and attempt to reach the non-English-speaking population, from whom a high percentage of DV applicants come, the officers conducted the conversation entirely in the Nepali language. Post program feedback throughout the year provided some indication that the program had substantial impact on its audience. In post's most recent public outreach initiative for applicants to avoid becoming fraud victims, a contract has just been signed with a local production company to produce a short film educating potential applicants about this issue.

#### E. ACS and U.S. Passport Fraud

21. Post sees relatively little ACS and U.S. passport fraud. In FY 2009, airport officials at Kathmandu's Tribhuvan International Airport detained a Nigerian national traveling on a passport that had been reported stolen in Nigeria. The individual used the passport to travel from Kathmandu to Bangkok, where immigration officials recognized he was not the same person as in the passport photo and deported him back to Nepal. The subject claimed to be fleeing from religious killings in Nigeria and requested post contact UNHCR on his behalf for assistance. Post's concern with lax security at Tribhuvan Airport prompted the consular section chief to conduct training for immigration officials on detecting imposters and false U.S. visas and passports for Nepal.

#### F. Adoption Fraud

22. Post processed 53 adoption cases in FY 2008. These were pipeline cases approved prior to the suspension on intercountry

adoptions in 2007. An agreement of resumption of intercountry adoptions was signed by the GON in January 2009. However, no cases were finalized, due to a change in government and bureaucratic disputes within the GON, the Ministry of Women, Children and Social Organization, and other organizations working on adoptions. In the last weeks of FY 2009, the Ministry resumed signing final adoption decrees.

¶23. Post reviewed and processed several cases, and significant fraud concerns were seen. In one case, two children were found together. The father came to claim one of the children, but not the other. Lack of record keeping by the police stations and orphanages, and large financial incentives to complete international adoptions make these cases highly susceptible to fraud and difficult to determine if the child is truly an orphan. A great deal more adoption cases are expected to follow in the coming weeks and months. The GON has also taken steps to establish a central adoption authority, but work remains to complete this goal. The government has newly registered 38 local agencies and nearly 60 international agencies, 33 of which are U.S.-based, through which international adoptions can be carried out.

¶24. Because adoptions in Nepal are vulnerable to fraud, each case is scrutinized carefully for fraud indicators and inquiries are made with the orphanage and police station. In the past, adoption fees have varied widely. Under the regulations, fees are set at \$8,000, of which \$5,000 goes to the orphanage and \$3,000 to the Ministry of Women, Children and Social Welfare. In the past, adoptive parents have reported paying between \$5,000 and \$25,000, and many parents complained that there are often unexpected fees added to finalize the adoption once they are in Nepal. Post remains concerned that the lucrative nature of international adoptions could encourage child trafficking. Field visits and detailed interviews with caregivers, orphanage directors, government officials and others are often required. Adoptive parents, meanwhile, usually have no incentive to share information with post officials, recognizing that discrepancies in information will be carefully investigated by consular staff during and after the visa interview.

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#### ¶G. Use of DNA Testing

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¶25. Post recommends DNA testing in family-based cases, primarily IV and asylum, in which there is insufficient evidence to establish the blood relationship to the satisfaction of the consular officer, and all other avenues to establish the relationship have been exhausted.

Nearly all DNA samples are taken using a buccal swab, under the observation of a cleared consular officer. Post is currently implementing new procedures whereby all samples will be taken in the consular waiting room by medical staff of the panel physicians. These samples are then forwarded to the U.S. for analysis. Nepal does not have an internationally-accredited lab that can perform DNA testing. Through DNA results, post has been able to catch several individuals having no genuine relationship to the petitioner and these petitions have been returned to DHS for revocation.

#### ¶H. Asylum and Other DHS Benefit Fraud

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¶26. During FY 2009, post issued 830 asylum follow-to-join (FTJ) cases, more than doubling FY 2008's 343 cases. With recent waves of asylum FTJ case files that post has received, FY 2010 will likely continue the trend of caseload increases seen over the past several years. With the recently-begun resettlement of thousands of Bhutanese refugees in the United States, post anticipates facing an substantial increase in refugee follow-to-join cases, as well. In FY 2009, post processed just two refugee follow-to-join cases. Confirmed cases of relationship fraud have been detected over the last fiscal year through DNA testing, including in asylum FTJ cases.

FPU investigated 19 cases and confirmed a few cases in which dependents presented false documents and claimed to be much younger than they actually were, in order to qualify to follow their asylee parent. In these cases, post returned the petition to DHS.

¶27. Post has an increase in the number what appear to be Nepalese economic migrants who have used the political asylum program as a means to emigrate to the U.S. In addition, post has seen cases in which non-Tibetans Nepalis applied for asylum in the U.S., claiming to be Tibetans who have been persecuted by the Chinese government.

¶28. Post does not process many cases of reported lost or stolen I-551 cards. Normally, card-holders are issued a transportation letter after verification is made through the Regional DHS office in New Delhi, and the validity of the letter is limited to one month both to prevent any possible fraudulent use by the recipient and to prevent the letter from being recycled.

#### ¶I. Alien Smuggling, Trafficking, Organized Crime, Terrorist Travel

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¶29. There is alien smuggling in Nepal. There is a growing body of evidence that consultants and other groups, offer to bolster an individual's visa application portfolio in exchange for money. Individuals applying for B1/B2 visas to participate in conferences and trade shows, and those applying for H and L visas are the primary participants in this type of alien smuggling. Post has noticed occasional attempts by persons with prior travel to the U.S. to take unrelated (and usually unqualified) persons with them to the U.S. This pattern indicates an attempt to peddle their 'visa credibility' for a fee.

¶30. In one such case a well-known Nepali actor who had previous U.S. travel applied to renew his visa along with a supposed employee of his movie production company. Although the employee had not traveled to the U.S. before, he had traveled in the region. The consular officer deemed the travel purpose credible, and both qualified for visas. It was only discovered later that the supposed employee had not returned from his trip to the U.S. When FPU contacted his home, a member of his family said that the individual was in the U.S. and did not have immediate plans to return to Nepal.

¶31. Low levels of competent entry screening, coupled with corruption at entry points, has contributed to a growth in alien smuggling from and through Nepal. Immigration officials report a

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small increase in the movement of third-country nationals -- mainly Chinese, Pakistanis and Bangladeshis and occasionally Afghanis, Somalis and Nigerians -- transiting Kathmandu with counterfeit documents. The majority of them are heading for Europe or the United States. Post works closely with immigration and police officials, in addition to Australian, Canadian, British, German and other European embassy and consulate officials based in Kathmandu, to identify and prevent smuggling attempts.

¶32. Nepal has long remained a source country for trafficked men, women and children. Many young women are trafficked into India and to the Middle East for prostitution. A large number of young women are also trafficked within Nepal to 'cabin' restaurants, dance bars and massage parlors that offer prostitution services. Men are trafficked to India, the Middle East and other Asian countries and are exploited for labor purposes. Children are sometimes trafficked to India for labor or to participate in circus acts. In recent years there has been increasing evidence of individuals who have been trafficked to India for the harvesting of their organs to be used in organ transplants.

#### ¶J. DS Criminal Fraud Investigations

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¶33. Consular Section and RSO staff members collaborate in efforts to combat fraud. Post is anticipating the arrival in 2010 of an ARSO-I position. This position will be highly valuable to the section in law enforcement liaison and fraud investigation. In September 2008, FPU heard that a Nepali Congress-affiliated informant wanted to talk about consultants selling fraudulent documents to applicants. FPU coordinated with the RSO and set an appointment. The informant came with fake blank documents from various banks in Nepal, educational documents, land documents,

property evaluation documents prepared by the fake chartered accountant and a fake government rubber stamp. The informant has been giving information to various diplomatic agencies to help stop fraud and stop consultants who extort money from Nepalis.

¶34. In August 2009, the same informant brought a newspaper advertisement with published photos of students who had been issued U.S. visas. According to the informant, those students paid 30-60,000 Nepalese rupees (400-800 USD) to a consultant for fake documents. In addition, he raised the new issue of a government entity issuing passports and citizenship documents to non-Nepalese for 30-35,000 (400 USD) Nepalese rupees.

¶35. In March 2009, two applicants for visas to the United States on the same day to take their USMLE exams. Consular Officers noticed the USMLE Step I and Step II score reports looked suspicious: both applicants earned the same marks in both tests. FPU confirmed with USMLE that the documents were fake. FPU also confirmed educational and job experience letters were also fake. FPU then worked with the Crime Investigation Department (CID) with the information given by the applicant to arrest the person who sold them the documents for 80,000 Nepalese rupees (1,030 USD). The vendor was an Indian National, so CID was unable to trace him but did arrest one of the applicants and some people involved in the case. Later, they were released on bail.

¶36. In another case, an Indian National applied for a tourist visa, posing as a Nepali Citizen. He fraudulently obtained a Nepali passport and citizenship from the District Administration office. FPU contacted the CID and the suspect was taken to the Police station for questioning. Police learned that he was a Nepali citizen but fraudulently obtained an Indian passport and applied for U.S. visa from India in 2008. He was later released by the CID.

#### ¶K. Host Country Passport, Identity Documents, and Civil Registry

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¶37. The level of passport fraud in Nepal is a concern for post. Genuine passports can be obtained fraudulently for a price. Post occasionally sees photo-substituted Nepali passports, chiefly used by non-Nepalis, to apply for U.S. visas. Recently, post was contacted by an individual who claimed to be able to obtain authentic but blank Nepali passport books. Nepal has stated a goal

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of converting to Machine Readable Passports by April 2010, but post is not confident that the government will be able to meet this goal on time.

¶38. Fraudulent civil documentation -- counterfeit documents or genuine documents issued by GON officials with counterfeit information -- is common in Nepal. Birth certificates, police certificates, death certificates, and marriage registration documents can all be purchased from corrupt officials at local government offices. Visa applicants submit fake civil registry documents, employment letters, sponsorship and financial documents and educational certificates. Applicants are even able to purchase counterfeit Nepali entry and exit stamps falsify re-entry to Nepal and to avoid detection of overstays in other countries. Access to DHS' Arrival Departure Information System (ADIS) has been vital in assisted the detection of counterfeit immigration stamps in at least three cases.

#### ¶L. Cooperation with Host Government Authorities

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¶39. Post enjoys very good relationships with officers of the Special Branch and the Criminal Investigation Division of the Police, resulting in past arrests of document vendors and corrupt government officials sold genuine passports and Nepali citizenship documents to non-Nepali citizens. Post has also nurtured very close working relationships with the Nepalese Department of Immigration (DOI). In order to maintain our working relationship with Nepalese officials, we hold periodic representational functions for our key contacts. Our experience shows that functions with smaller groups of individuals are more effective than hosting one large group of

all our working contacts.

#### M. Areas of Particular Concern

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¶40. Given the level of corruption in the country and the porous border with India, criminal movement in and out of Nepal is easy. A third-country national with ill-intent could potentially buy fraudulent Nepalese documents and attempt to travel from Nepal to the United States, pretending to be a Nepali citizen. Post is concerned about the potential for terrorists to use Nepal as a transit point for entry into the United States. One opportunity post has to stop this kind of attempt is during document intake at visa interviews. Since our LES staff members collect documents from all visa applicants, they have an opportunity to identify a third country national posing fraudulently as a Nepali citizen by determining whether an applicant is a native Nepali speaker or not.

¶41. Whenever possible, post holds anti-fraud trainings for immigration, police, and airline officials to familiarize them with U.S. travel documents, basic document security features, and imposter recognition. Additionally, post uses the opportunity to highlight their role and importance in curbing alien smuggling, trafficking and other visa-related fraud.

#### N. Staffing and Training

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¶42. Embassy Kathmandu's FPU is composed of senior fraud prevention LES Sashi Limbu and fraud prevention FSN Nandini Pradhan. Fraud Prevention Manager Tack Lim recently arrived September 29, 2009.

¶43. Our senior fraud prevention FSN attended fraud prevention training held by the Foreign Service Institute in March 2008. The second fraud prevention LES has recently been hired and has not yet had an opportunity to attend any training.

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